

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	
	:	Chapter 13
	:	
Regina Gail Blann	:	Bankruptcy Case
	:	No. 19-15972-pmm
	:	
Debtor	:	

STIPULATION RESOLVING OBJECTION TO CLAIM No. 5

Plaintiff, Regina Gail Blann, (hereinafter referred to as the Debtor) and the Internal Revenue Service (hereinafter referred to as Defendant or IRS), by and through undersigned counsel, hereby stipulate and agree to resolve the objection to the IRS's proof of claim number 5 as follows:

1. On September 24, 2019, the debtor filed a voluntary petition for Chapter 13 bankruptcy with this Court.
2. On December 10, 2019, the IRS filed Proof of Claim 5-1 asserting a Priority claim of \$76,022.95. (Exhibit A – IRS Proof Of Claim 5-1).
3. The debtor's filed an objection to the IRS's claim.
4. The IRS filed a response to the Objection on March 11, 2020.
5. To resolve the Objection to Claim No. 5, the IRS agrees to accept \$19,000 from the debtor as satisfaction of its claim against the debtor.
6. Debtor shall make a single \$10,000 payment to the IRS from the proceeds of a sale of debtor's property within thirty (30) days from the closing of the sale of that property.
7. Debtor shall pay the remaining \$9,000 in monthly priority payments following the confirmation of the bankruptcy plan.
8. If the debtor defaults on the payments to the IRS, the IRS shall notify the

debtor in writing of said default. The debtor shall have 30 days from the date of the notice of default to cure the default. Should debtor fail to cure the default, the IRS is relieved from the bankruptcy stay and may pursue collection of the outstanding debt.

9. If the Debtor does not successfully complete her approved Chapter 13 plan, the IRS may pursue all remaining unpaid debt listed in Proof of Claim 5.

Respectfully submitted,

/s/ Michael Hess

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Counsel for the Debtor

/s/ Anthony St. Joseph

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Counsel for IRS

Approved By The Court:

HONORABLE PATRICIA M. MAYER
Judge, United States Bankruptcy Court

DATED: _____